

0IN THE UNITED STATES OF AMERICA  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 4:14CR28
	§	Judge Crone
GEORGE PARR (14)	§	

**ELEMENTS OF THE OFFENSE**

You are charged in Count One of the Information with a violation of 18 U.S.C. § 1952(a)(3), Interstate and Foreign Travel or Transportation in Aid of Racketeering Enterprises. The essential elements which must be proved beyond a reasonable doubt in order to establish a violation of that section are:

1. Interstate/international travel, use of the mails, or the use of the facilities of interstate/foreign commerce.
2. With the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment or carrying on, of any unlawful activity.
3. Subsequent performance or attempted performance of an act, as defined by the statute.

Respectfully submitted,

JOHN M. BALES  
United States Attorney

\_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on March 16, 2015.

\_\_\_\_\_/s/\_\_\_\_\_  
ERNEST GONZALEZ